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February 21, 2025

By ECF

Honorable Jeannette A. Vargas
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Aubrey Drake Graham v. UMG Recordings, Inc.*
Case No. 1:25-cv-399-JAV
Letter Motion to Adjourn Initial Pretrial Conference

Dear Judge Vargas:

We represent Defendant UMG Recordings, Inc. (“UMG”) in the above-captioned matter. We write to request that the initial pretrial conference currently scheduled for April 2, 2025, *see* ECF No. 8, be adjourned pending resolution of UMG’s forthcoming motion to dismiss, which is due March 17, 2025. The purpose of the conference would be to set a case schedule, but, as will be shown in UMG’s motion to dismiss (*see* ECF Nos. 6, 15), this case should not proceed because Plaintiff fails to state any claims; at a minimum, the conference is premature until the Court determines whether and in what form (if at all) the case will move forward. Indeed, the pleadings are *currently* in flux: pursuant to separate correspondence, Plaintiff has agreed to withdraw certain key allegations in his complaint. We understand that Plaintiff opposes adjournment of the conference because he wants to start discovery, but discovery is premature for the same reasons, and in any event, Plaintiff has not yet even delivered Rule 34 document requests, *see* Fed. R. Civ. P. 26(d)(2) (authorizing delivery of document requests prior to Rule 26(f) conference).

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Rollin A. Ransom
Rollin A. Ransom

Attorney for UMG Recordings, Inc.

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cc: All counsel of record (via ECF)